

ALDEN F. ABBOTT
General Counsel

BRADLEY DAX GROSSMAN
Mass. Bar No. 669358
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., NW
Washington, D.C. 20580
Telephone: 202-326-2994
Facsimile: 202-326-2477
Email: bgrossman@ftc.gov

Attorneys for the Federal Trade Commission

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Richard Zeitlin; Unified Data Services, LLC; Compliance Consultants, LLC; and American Technology Services, LLC,

Plaintiffs,

V.

United States Federal Trade Commission,

Defendant.

Case No: 2:19-cv-00698-JCM-VCF

Stipulation and Order to Extend Deadline for Proposed Scheduling Order

(Second Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Richard Zeitlin, along with the Plaintiff companies set forth in the caption above (the "Plaintiffs"), and Defendant, the Federal Trade Commission ("FTC"), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order to extend the parties' deadline to file a Joint Proposed Scheduling Order until the Court rules on the FTC's pending Motion to Stay Discovery (ECF No. 27). This is the parties' second request for an extension of time to file the Joint Proposed Scheduling Order.

On July 30, 2019, the FTC moved to stay discovery pending resolution of its Motion

1 to Dismiss. Plaintiffs filed a partial opposition to the stay motion on August 9, 2019 (ECF
2 No. 29), and the FTC's reply is due on August 16, 2019. The Parties stand by their respective
3 positions.

4 On August 12, 2019, the parties stipulated to a three-day extension of time to submit
5 a Proposed Scheduling Order, explaining that they needed more time to confer. After
6 conferring, the parties have agreed that the most efficient course is to defer entry of a Joint
7 Proposed Scheduling Order until the Court resolves the FTC's Motion to Stay Discovery.

8 Accordingly, the parties agree that should the Court deny the FTC's pending Motion
9 to Stay Discovery, the parties will submit a Joint Proposed Scheduling Order at a date to be
10 determined by the Court in its ruling.

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2 Respectfully submitted this 15th day of August, 2019.

3 THE BERNHOFT LAW FIRM, S.C.

ALDEN F. ABBOTT
General Counsel

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5 By: /s/ Thomas E. Kimble

JOEL MARCUS
Deputy General Counsel

6 Thomas E. Kimble, Esq.
7 Illinois Bar No. 6257935
8 1402 E. Cesar Chavez Street
9 Austin, Texas 78702
Tel: (512) 582-2100
Email: tekimble@bernhoflaw.com

By: /s/ Bradley Grossman
BRADLEY DAX GROSSMAN
Mass. Bar No. 669358
Attorney
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., N.W.
Washington, DC 20580
Tel.: (202) 326-2994
Email: bgrossman@ftc.gov

10 *Attorney for Plaintiffs, pro hac vice*

Attorneys for Federal Trade Commission

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14 **SO ORDERED:**



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17 **UNITED STATES MAGISTRATE JUDGE**

18 8-15-2019

19 **DATED:** _____
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PROOF OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PROPOSED SCHEDULING ORDER** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Dated: August 15, 2019.

/s/ Bradley Grossman
BRADLEY DAX GROSSMAN
Attorney, Federal Trade
Commission